



*Serving Our Clients and Community
For Over 100 Years*

THOMAS J. COTTON

Admitted in NJ & NY

Direct Line: 973-540-7333

Email: tjc@spsk.com

220 Park Avenue

PO Box 991

Florham Park, NJ 07932

Telephone: 973-539-1000

Fax: 973-540-7300

www.spsk.com

November 30, 2020

Via ECF

Hon. Edward S. Kiel, U.S.M.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: Smith v. Pro Custom Solar LLC
Case No. 2:19-cv-20673-KM-ESK
Our File No. 28369-52
Litigation Status Report

Dear Judge Kiel:

This firm represents Pro Custom Solar LLC d/b/a Momentum Solar (“Defendant”) in the above-referenced matter. Defendant, along with plaintiffs Stewart Smith and Brennan Landy (collectively, “Plaintiffs”), respectfully submit this joint status report in advance of the December 3, 2020 case-management conference.

On September 28, 2020, Your Honor entered a case-management order that included a comprehensive discovery schedule. The next milestone on that schedule is the April 16, 2021 deadline for completion of fact discovery. The parties are, at present, progressing through fact discovery and expect to continue doing so.

Respectfully submitted,

SCHENCK PRICE SMITH & KING, LLP

s/ Thomas J. Cotton, Esq.
Thomas J. Cotton, Esq.

WOODROW & PELUSO, LLC

s/ Patrick H. Peluso, Esq.
Patrick H. Peluso, Esq.

TJC/s

cc (via ECF):

All counsel of record